

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America
ex rel. ALEX DOE, Relator,

The State of Texas
ex rel. ALEX DOE, Relator,

The State of Louisiana
ex rel. ALEX DOE, Relator,
Plaintiffs,

v.

Defendants.

CIVIL ACTION NO. 2:21-CV-
00022-Z

Date: November 2, 2022

AFFILIATE DEFENDANTS' MOTION FOR PROTECTIVE ORDER

Defendants Planned Parenthood Gulf Coast (“PPGC”), Planned Parenthood of Greater Texas, Inc. (“PPGT”), Planned Parenthood South Texas, Inc. (“PPST”), Planned Parenthood Cameron County, Inc. (“PP Cameron County”), and Planned Parenthood San Antonio, Inc. (“PP San Antonio”) (collectively “Affiliate Defendants”) move pursuant to Paragraph 7 of the Protective Order [ECF 133] for an order “to preserv[e] the designated status of [] disputed information” of Affiliate Defendants’ document productions to Relator.

WHEREFORE, Affiliate Defendants respectfully move that this Honorable Court enter an Order preserving the confidentiality designations at issue.

Dated: November 2, 2022

Respectfully submitted,

ARNOLD & PORTER KAYE SCHOLER
LLP

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Cameron County, Inc., and Planned
Parenthood San Antonio, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on November 2, 2022, the foregoing document was electronically filed with the Clerk of Court using CM/ECF.

/s/ Tirzah S. Lollar
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